

**FEDERAL ELECTION COMMISSION**  
999 E Street, N.W.  
Washington, D.C. 20463

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**FIRST GENERAL COUNSEL'S REPORT**

**SENSITIVE**

RAD REFERRAL: 99NF-1  
DATE ACTIVATED: January 26, 1999

STAFF MEMBER: Stephanie Watson  
Mark Shonkwiler

SOURCE: INTERNALLY GENERATED

RESPONDENTS: American Society of Consultant Pharmacists PAC  
and Bill Green as Treasurer

RELEVANT STATUTES: 2 U.S.C. § 434(a)(4)(A)(i)  
11 CFR § 104.5(c)(1)(i)(A)

INTERNAL REPORTS CHECKED: Disclosure Reports

FEDERAL AGENCIES CHECKED: None

**I. GENERATION OF MATTER**

The Reports Analysis Division ("RAD") referred the American Society of Consultant Pharmacists PAC and its treasurer, ("Committee") to the Office of the General Counsel on January 5, 1999. The basis for the RAD referral is the failure of the Committee to timely file their 1998 April Quarterly Report.

**II. FACTUAL AND LEGAL ANALYSIS**

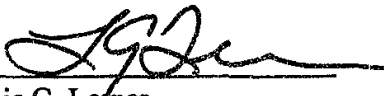
Based on the Factual and Legal Analysis, see Attachment 1, this Office recommends the Federal Election Commission ("Commission") find reason to believe the respondents violated 2 U.S.C. § 434(a)(4)(A)(i).

**IV. RECOMMENDATIONS**

1. Open a MUR.
2. Find reason to believe that the American Society of Consultant Pharmacists PAC and Bill Green, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i), and take no further action.
3. Approve the attached Factual and Legal Analysis.
4. Approve the appropriate letter.
5. Close the file.

Lawrence M. Noble  
General Counsel

2/24/98  
Date

BY:   
Lois G. Lerner  
Associate General Counsel

**Attachments:**

1. Factual and Legal Analysis